

DECLARATION OF PATRICE WHITNEY

I, Patrice Whitney, declare:

1. I am Gary Whitney's wife. I have personal knowledge of the facts stated herein and, if sworn as a witness, I could and would testify competently thereto.
2. I am married to and live with my husband, Gary Whitney. We have been married for over 27 years.
3. In late June 2004, Gary called me from Los Angeles where he had gone for a meeting with his supervisor at Delphi, Mike Roberts. During the telephone call, Gary sounded shocked and distraught as he informed me that he had just been fired. Gary told me that he couldn't understand why he had been fired when his supervisors had repeatedly told him that his performance had been "excellent" and "outstanding." Gary sounded angry as he explained that he believed that he had been fired him because of his age.
4. When Gary arrived home, he explained to me how the firing had occurred

- that Mr. Roberts had said he was being fired, that Gary had asked Mr. Roberts why he was being fired, that Mr. Roberts had asked Gary whether they had to “go there,” that Mr. Roberts introduced Gary to Mr. Valanty, that Mr. Roberts said Gary hadn’t done anything wrong, that Gary told them he thought they were firing him because of his age, that neither Mr. Roberts nor Mr. Valanty denied his statement, and that they told him that he did not have the fit and finish for the new team. Gary explained to me that he took their statement to mean he didn’t “fit” in a 30-something group and he didn’t have the same “finish” as the younger team members because his appearance was old.

5. After Delphi fired him, I saw major changes not only in Gary but also in our relationship. Prior to the time that Delphi fired him, Gary was happy, he didn’t appear to worry that often, he slept well at night, and we generally got along smoothly. After he was fired, as explained below, these things changed for the worse:

A. After he was fired, Gary was no longer happy or worry-free. He became depressed, anxious and apprehensive. He worried that at his age (57) he would not be able to get a decent job much less a job comparable to the good position that he had at Delphi (Gary seemed to love his work at Delphi). He also worried that we could no longer afford our home (in Grants Pass, Oregon), that we would have to sell it, that we would have to move to a less expensive area, and that we might have to start to use our

savings and, perhaps, our retirement long before we had planned. As Gary began to get rejected each time he applied for a position, he became more depressed and more anxious/stressed. In our generation, men are taught that they are responsible for supporting their families and that they must be the breadwinner. This is true for Gary and I believe that he took being fired and his inability to support us as a personal failure. As a result of his depression/anxiety/stress, he began to see a psychiatrist. The psychiatrist prescribed Lexapro (an anti-depressant/anxiety medication).

B. After Gary was fired, he no longer slept well at night. On many, many nights, he laid awake all night. On many other nights, he had difficulty falling asleep and/or he would wake up around Midnight and not be able to go back to sleep until nearly 5:00 a.m. Gary told me that he was unable to sleep because he had all of these thoughts racing through his head about his being fired and his wondering how he was going to be able to support us. Eventually, Gary's inability to sleep became so profound that he had to begin taking Ambien.

C. After he was fired, our relationship began to suffer. Perhaps because he was tired from lack of sleep or because of his depression/anxiety, Gary often became irritable and angry with me and we began to become mad at each other for no real reason.

Our marriage became extremely stressful and on multiple occasions, tears were shed by both of us.

6. Ultimately, because Delphi fired Gary and he was not able to obtain a job with comparable compensation, we were forced to sell our house (in Grants Pass, Oregon), move to a less expensive city, buy a less expensive house (in Colorado), and live off of our savings. In essence, Delphi's firing of Gary destroyed our dream of retiring in Grants Pass, Oregon and living in the wonderful house that we had purchased there.

I declare under penalty of perjury under the laws of the State of California, the State of Colorado, and the United States that the foregoing is true and correct.

Executed this 16th day of July 2007 at Fort Collins [name of City],
Colorado [Name of State].

Patrice Whitney
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